

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHRISTOPHER IRVING

Plaintiff,

V.

COOK COUNTY SHERIFF'S OFFICE, *et al.*

Defendants

[illegible]

Case No. 22-CV-6599

Judge Andrea Wood

**DEFENDANTS' COOK COUNTY SHERIFF'S OFFICE, COOK COUNTY, MARTHA
YOKSOULIAN, ERICA QUEEN, ESEQUIEL IRACHETTA,
PATRICK FITZGERALD AND DANIEL LAKOWSKI'S
MOTION FOR LEAVE TO DEPOSE AN INCARCERATED INDIVIDUAL**

Defendants, Cook County Sheriff's Office, Cook County, Martha Yoksoulian, Erica Queen, Esequial Irachetta, Patrick Fitzgerald and Daniel Lakowski, by and through their counsel, respectfully request leave to take the deposition upon oral examination of Cedric Johnson, who is confined in Sheridan Correctional Center in Sheridan, LaSalle County, Illinois, pursuant to Rule 30(b)(2), and in support, state as follows:

1. Plaintiff alleges that he sustained injuries because of Defendants' failure to protect him while he was confined at Cook County Department of Corrections.

2. Specifically, Plaintiff alleges he sustained injuries when he was assaulted by another inmate, Cedric Johnson, while he was confined at Cook County Department of Corrections.

3. Mr. Johnson pled guilty to aggravated battery and he is currently confined at Sheridan Correctional Center, located at 4017 E. 2603rd Rd, Sheridan, Illinois.

4. Defendants seek to depose Mr. Johnson regarding his observations and interactions with Plaintiff, as well as the events leading up to the physical altercation and the circumstances of his verbal exchange with Plaintiff.

WHEREFORE, Defendants Cook County Sheriff's Office, Cook County, Martha Yoksoulion, Erica Queen, Esequial Irachetta, Patrick Fitzgerald and Daniel Lakowski respectfully request that this Court allow them to take the deposition of Cedric Johnson, currently confined at Sheridan Correctional Center.

Respectfully submitted,

KIMBERLY M. FOXX
State's Attorney of Cook County

By: /s/ William B. Oberts
Special State's Attorney
On behalf of Defendants

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 31, 2023, a true and correct copy of Defendants' Cook County Sheriff's Office, Cook County, Martha Yoksoulion, Erica Queen, Esequiel Irachetta, Patrick Fitzgerald and Daniel Lakowski's Motion for Leave to Depose an Incarcerated Individual, was served upon:

<i>Attorney for Plaintiff</i> Heidi Karr Sleper Kurtz, Sleper & Exline, LLC 610 W. Roosevelt Road, Suite A2 Wheaton, IL 60187 (630) 323-9444 hsleper@kselegal.com	<i>Attorney for Defendant Alecia Lobiancao</i> Jason DeVore Troy S. Radunsky Special Assistant State's Attorney 230 W Monroe St, Ste 230 Chicago, IL 60606 312-300-4479 jdevore@devoreradunsky.com tradunsky@devoreradunsky.com
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Service was accomplished pursuant to ECF as to Filing Users and complies with LR 5.5, as to any party who is not a Filing User or represented by a Filing User by emailing a copy to the above-named attorney or party of record at the address listed above.

s/William B. Oberts
an Attorney